

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

SHANNON CORBETT
Plaintiff,

v.

TEXAS TECH UNIVERSITY
HEALTH SCIENCES CENTER
Defendant.

§
§
§
§
§
§
§

CASE NO. 5:21-cv-281

NOTICE OF REMOVAL FROM STATE COURT

NOW COMES Defendant, Texas Tech University Health Sciences Center, and respectfully shows that:

1. **Removal Provision:** This removal is pursuant to 28 U.S.C. § 1441(a). In her Original Petition and her First Amended Petition, Plaintiff alleges Defendant violated Title VII of The Civil Rights Act of 1964 § 704(a), §42 U.S.C. § 2000e.
2. **State Action:** Plaintiff filed her Original Petition in the 237th Judicial District Court of Lubbock County, Texas, on October 12, 2021, Cause No. DC-2021-CV-0370. Plaintiff filed her First Amended Petition on October 13, 2021. Plaintiff is Shannon Corbett. Defendant is Texas Tech University Health Sciences Center. Defendant was served with the Original Petition on October 25, 2021. Venue is proper in the United States District Court for the Northern District of Texas, Lubbock Division.
3. **Nature of the Lawsuit:** Plaintiff alleges that Defendant violated Title VII of The Civil Rights Act of 1964 § 704(a), §42 U.S.C. § 2000e and Chapter 21 of the Texas Labor Code (also known as The Texas Commission on Human Rights Act or “TCHRA”).
4. **Jury Demand:** Plaintiff demands a trial by jury in her First Amended Petition.

5. **Consent:** Upon information and belief no other Defendants have been served at the time of this removal.
6. **Removal Requirements of 28 U.S.C. §1441:** Plaintiff's allegations regarding violation of Title VII of The Civil Rights Act of 1964 § 704(a), §42 U.S.C. § 2000e raise federal questions over which a district court of the United States has original jurisdiction.
7. **Compliance with Deadline:** Defendant was served with the Original Petition on October 25, 2021. Defendant has 30 days in which to remove. Therefore, this removal is timely. Defendant filed its Answer and Affirmative Defenses in state court on November 10, 2021.
8. **State Court Pleadings:** A true and correct copy of all process and pleadings served upon Defendant in the state court action are being filed with this notice as required by 28 U.S.C. § 1446(a).

ACCORDINGLY, Defendant prays that this cause be removed to the United States District Court Northern District of Texas, Lubbock Division, pursuant to Section 1441 of Title 28 of the United States Code.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN COWLES
Deputy Attorney General for Civil Litigation

THOMAS A. ALBRIGHT
Chief, General Litigation Division

/s/ Yvonne D. Bennett

YVONNE D. BENNETT

Texas Bar No. 24052183

Attorney-in-Charge

Assistant Attorney General

Office of the Attorney General

P.O. Box 12548

Austin, Texas 78711-2548

Phone: 512-463-2120

Fax: 512-320-0667

Email: Yvonne.Bennett@oag.texas.gov

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served via PACER
electronic notification on this 16th day of November, 2021, on:

Carrie A. Harris

Matthew Harris Law, PLLC

1001 Main Street, Suite 200

Lubbock, TX 79401

FrontDesk@MatthewHarrisLaw.com

(806) 702-4852

(800) 985-9479 fax

Attorney for Plaintiff

/s/ Yvonne D. Bennett

YVONNE D. BENNETT

Assistant Attorney General